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March 9, 2022

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The Honorable Sarah Netburn
United States Magistrate Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001, 03-md-1570 (GBD) (SN)*
Havlish, et al., v. Bin-Laden, et al., No. 03-cv-9848 (GBD) (SN)
Re: Proposed Schedule for the Havlish Plaintiffs' Enforcement Proceeding

Dear Judge Netburn:

On March 3, 2022, following consultation with counsel for the PEC Plaintiff Groups, the Havlish Creditors submitted a proposed schedule for briefing on their anticipated motion to compel the Federal Reserve Bank of New York to turn over assets it holds in the name of Da Afghanistan Bank. *See* MDL Dkt. 7725. In their letter, the Havlish Creditors proposed (1) that their Motion for Turnover be due March 14, 2022; (2) that the PEC Plaintiff Groups' responses, if any, be due within seven days after the Havlish Creditors file their Motion for Turnover; and (3) that the Havlish Creditors' reply, if any, be due within seven days after the PEC Plaintiff Groups file their responses.

In light of the fact that March 14, 2022 is now five days away, the Havlish Creditors respectfully adjust their proposed schedule such that they now propose to file the Motion for Turnover on March 17, 2022, or within seven days of the Court's entry of a scheduling order, whichever is later. For the reasons stated in their March 3, 2022 letter, Dkt. 7725, the Havlish Creditors continue to propose that the PEC Plaintiff Groups' responses, if any, be due within seven days of the filing of the Motion for Turnover, and that the Havlish Creditors' reply be due within seven days of the filing of the responses.

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The Havlish Creditors thank the Court for its consideration.

Respectfully submitted,

/s/ Lee S. Wolosky

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cc: All counsel of record (by ECF)